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SEP 23 1999

September 20, 1999

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Mr. Lester Snow, Executive Director
CALFED BAY-DELTA PROGRAM
1416 Ninth Street, Suite 1155
Sacramento CA 95814

Dear Mr. Snow:

As you know, the Trinity River and the ongoing efforts toward its restoration are completely independent of the CALFED process. Restoration of the Trinity and its entire ecosystem is mandated in the legislation authorizing construction of the Trinity River Division of the Central Valley Project (CVP), the Central Valley Project Improvement Act (CVPIA), and the Trinity River Basin Fish and Wildlife Management Act of 1984. Further, the CVPIA reaffirms the Trinity's unique position within the CVP and clearly states that restoration of the Trinity is to be considered independently from other water issues in California.

However, with CALFED we have a once in a lifetime opportunity to restore California's waterways and the troubled San Francisco Bay-Delta. Thus, we are compelled to issue comments to ensure that CALFED not miss this historic opportunity to redefine water use in California and to reverse the environmental destruction wrought by excessive diversions and too many dams.

While in many ways the CALFED Phase 2 document is a clear improvement from previous drafts, there are still vital elements either lacking or items which require further explanation. First, CALFED should state, without any qualification, its commitment to improving the Bay-Delta and tributary streams and alleviating water quality and supply problems by first exhausting non-engineering solutions. The idea that CALFED can fix the environmental and water quality problems created by our 1400 dams and excessive water diversion by building more dams and diverting more water is absolutely absurd. It is time to concentrate our efforts on new methods of water management including comprehensive groundwater management, true-cost pricing for water, reclamation and re-use, retiring of marginal agricultural lands, increased groundwater storage, and increased efficiency in water use.

To that end, CALFED should not even consider new surface storage during the first stage, and should only begin to study increased surface storage

if alternative solutions have been given a genuine and honest opportunity to succeed but have failed. Alternative solutions are by far the most economically efficient and least environmentally destructive. We believe and support CALFED's objective to "develop a long-term comprehensive plan that will restore ecological health and improve water management for beneficial uses of the Bay-Delta system." The only way to do this effectively is to dedicate more water for environmental purposes as required by existing law.

More dams and reservoirs are clearly not the answer. As recognized in the CALFED Environmental Restoration Program Plan (ERPP), the single most limiting factor for Steelhead populations in the Central Valley is blocked access to an estimated 82% to 95% of the historical spawning and rearing habitat because of impassable dams. We concur with CALFED's statement in the ERPP, Volume 1 that "removal of barriers provides the highest probability of restoration success." Removal of out-of-date dams should be aggressively pursued.

Further, no dam enlargement or off-stream storage should be considered, even after Phase 1, that affect rivers and streams eligible for National Wild and Scenic status or which support endangered or threatened fish runs. These include, but are not limited to, Shasta Dam, the Red Bank project, the Thomes-Newville project, and Sites reservoir. Also, the first leg of a Peripheral Canal should not be included in CALFED. This project would degrade water quality further and would inflict more harm upon the estuary. Thus, it is in direct conflict with the stated objectives of CALFED.

A key element lacking in this document is a commitment to more water for the Delta. Without more water flowing through the Bay a "comprehensive plan" to restore the estuary will not work. The document should specifically detail how much water will be allocated to restoring the Bay and how and when that water will be acquired and actually delivered to the Bay. The document fails to designate an acquisition program. Such a program could be included in the Environmental Water Account (EWA). Successful restoration absolutely requires more freshwater flowing through the Delta. Thus, diversions must be capped and eventually must be reduced.

The description of the potential operation of an EWA that is contained in the Phase 2 report indicates that EWA funds would be used to reimburse agriculture for reduced exports due to environmentally restricted pumping. This is not the intent of an Environmental Water Account and such language should not be included in the final document. Taking money from the EWA and using it to reimburse irrigators is a clear demonstration of priorities favoring irrigators who have for year been overfed at the taxpayer's trough, and at the expense of just modestly improved environmental health. The intent of CALFED, according to its mandate, should clearly be to improve riparian ecosystems including but not limited to the San Francisco Bay-Delta.

Further, the EWA should be used as a mechanism to gain more water for ecosystem restoration. The EWA should pursue actively the acquisition of water on top of CVPIA b2 or other water already appropriated for environmental purposes such as restoration of the Trinity River. The EWA should be configured to establish a baseline of environmental of flows with any new flows used to supplement, not replace, existing flows.

Also, the document should specify that all natural tributaries contribute their fair ecological share to the Delta outflow. This will require fewer stream diversions and will help toward the restoration of these streams.

Another element missing from this document is clear and beneficial objectives for the restoration of fish runs. The restoration objectives for steelhead population levels are far too conservative to be beneficial. Returning fish populations to their historical levels, before the destructive diversions, should be one of CALFED's main objectives. The long-term goal of restoring the estuary and tributaries should be similar to that of the Trinity River. The Trinity River Basin Fish and Wildlife Management Act of 1984 states clearly that its goal is to restore fish populations to those levels which existed immediately preceding construction of the dams. This objective has given the Trinity River a realistic opportunity for restoration, and such a clear mandate could serve as the backbone of CALFED's restoration efforts.

Part of CALFED's efforts to restore fish populations should include providing sufficient coldwater summer flows in the Central Valley for migrating steelhead. Temperature controls are absolutely mandatory for the recovery of fish runs, and should be included in the Ecosystem Restoration Program Plan (ERPP). Further, the ERPP should provide for adequate flows and affirmative action to restore striped bass populations. This requires sufficient Delta outflows to carry migrating fish to sea and to prevent entrapment in pumping plants.

A major failing of the Ecosystem Restoration Program Plan is CALFED's unwillingness to confront issues of agricultural inefficiency and its creation of unhealthy and toxic runoff.

The document underestimates how much water the agriculture community can effectively conserve. This document assumes irrigators can conserve merely a minuscule 1-3 percent of current usage. However, demonstration projects and innovative farmers have implemented conservation measures that have resulted in decreased water usage as much as 25-50 percent without sacrificing crop yields.

Another method to achieve water conservation and improved water quality is by retiring marginal agricultural lands. This was anticipated in the

CVPIA. This strategy, if aggressively pursued, could save upwards of two million acre-feet of water annually and improve the quality of drinking water for almost half of California's population.

The potential for water savings through retirement of polluted lands and conservation is tremendous. However in this document conservation is underfunded or made voluntary while new surface storage is pursued aggressively. Conservation efforts work, are far less expensive than alternatives, and are a sustainable investment in our resources.

The progress we've made in the past to return water to its natural origin to improve fish habitat or water quality is a good first step. However, much more needs to be done, and clearly the most efficient way to achieve these objectives is to decrease diversion from our rivers. No fish or riparian plant can live on mechanical restoration alone, nor can fish walk, as it has been said. Our rivers and Bay clearly need more water.

Sincerely,



Tina Andolina

Friends of the Trinity River,
Associate Executive Director

CC: Bruce Babbitt, Department of the Interior
Patricia Beneke, Department of the Interior
David Hayes, Department of the Interior
David Cottingham, Department of the Interior
Dianne Feinstein, U.S. Senate
Barbara Boxer, U.S. Senate
George Miller, House of Representatives
Mike Thompson, House of Representatives
Wally Herger, House of Representatives
Lois Capps, U.S. House of Representatives
Gray Davis, Governor of California
John Burton, California Senate
Jim Costa, California Senate
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